



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO: 04 11572 JLT

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SUSAN COONEY,	)
Plaintiff,	)
	)
v.	)
	)
HUMANISTIC PSYCHOLOGY	)
INSTITUTE, d/b/a SAYBROOK	)
INSTITUTE and MAUREEN O'HARA,	)
Individually,	)
Defendants.	)


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**AFFIDAVIT OF MAUREEN O'HARA**

I, Maureen O'Hara, do hereby depose as follows:

1. I currently reside in Greenbrae, California. Since 1975, I have resided continuously in the State of California.
2. Since 1999, I have been the President of Humanistic Psychology Institute d/b/a Saybrook Graduate School and Research Center ("Saybrook").
3. Prior to becoming President, I was the Dean of Saybrook from 1997 until 1999.
4. Saybrook is a non-for profit institution under the Internal Revenue Code Section 501(c).
5. While enrolled at Saybrook, Susan Cooney's course work consisted of electronic and telephonic communications with faculty. Additionally, Ms. Cooney engaged in multiple week long conferences and classroom work in San Francisco, California. Saybrook did not hold any teaching conferences or classroom courses in Massachusetts.
6. During her enrollment, I was never in the position of Ms. Cooney's appointed professor, faculty member, advisor or mentor.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 2 DAY OF  
AUGUST 2004.

  
Maureen O'Hara